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Attorney for Angel Quintero-Ochoa

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HONORABLE BARRY TED MOSKOWITZ)

UNITED STATES OF AMERICA,)	Case No. 08CR1358-BTM
)	
Plaintiff,)	Date: June 30, 2008
)	Time: 2:00 p.m.
v.)	
)	NOTICE OF MOTIONS AND MOTIONS
ANGEL QUINTERO-OCCHOA,)	TO:
)	
Defendant.)	1) COMPEL DISCOVERY;
)	2) FILE FURTHER MOTIONS
)	
)	

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, and
PAUL STARITA, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on Monday, June 30, 2008, at 2:00 p.m.,
or as soon thereafter as counsel may be heard, the defendant, Angel
Quintero-Ochoa, by and through his attorney, Gary P. Burcham, will ask
this Court to enter an order granting the motions listed below.

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MOTIONS

Angel Quintero-Ochoa, the defendant in this case, by and through his attorney, Gary P. Burcham, pursuant to the Amendments to the United States Constitution, Fed. R. Crim. P., and all other applicable statutes, case law and local rules, hereby moves this Court for an order:

- 1) to compel discovery;
- 2) to file further motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

Dated: June 2, 2008

/s/ Gary P. Burcham
GARY P. BURCHAM
Attorney for Angel Quintero-Ochoa

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

1	UNITED STATES OF AMERICA,)	U.S.D.C. No. 08CR1358-BTM
2)	
3	Plaintiff-Appellee,)	CERTIFICATE OF SERVICE
4	v.)	
5)	
6	ANGEL QUINTERO-OCHOA,)	
7	Defendant-Appellant.)	

8 IT IS HEREBY CERTIFIED THAT:

9 I, GARY P. BURCHAM, am a citizen of the United States and am at
 10 least eighteen years of age. My business address is 964 Fifth Avenue,
 11 Suite 300, San Diego, CA 92101.

12 I am not a party to the above-entitled action. I have caused
 13 service of Defendant's Motion For Discovery and For Leave To File Further
 14 Motions on the following party or parties by electronically filing the
 15 foregoing with the Clerk of the District Court using its ECF System,
 16 which electronically notifies him/her.

17 **Paul Starita, Esq.**
 18 **Assistant United States Attorney**
 19 **Border Crimes Unit**
 20 **880 Front Street**
 21 **San Diego, CA 92101**

22 I declare under penalty of perjury that the foregoing is true and
 23 correct.

24 Executed on June 2, 2007.

25 /s/ Gary P. Burcham
 26 GARY P. BURCHAM